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12 HSBC Bank USA, as Trustee for MANA 2007-AFI
13 09-72456 / xxxx3980

11 UNITED STATES BANKRUPTCY COURT
12 DISTRICT OF NEVADA

13 In Re:

BK-S-09-16270-BAM

14 Nathaniel Cromwell, Jr. dba Fantasy Scapes and
15 Roshon Cromwell,

Date: March 9, 2010
Time: 1:30 p.m.

Chapter 13

16 Debtor(s).
17

18 TO THE HONORABLE JUDGE BRUCE A. MARKELL, THE DEBTORS, HIS
19 ATTORNEY OF RECORD AND THE CHAPTER 13 TRUSTEE, AND OTHER INTERESTED
20 PARTIES:
21

22 PLEASE TAKE NOTICE that on the 9TH day of MARCH, 2009 at
23 1:30 P.M. before United States Bankruptcy Judge, the Honorable, Bruce A. Markell in Courtroom 3,
24 located at the Foley Federal Building, 300 Las Vegas Boulevard South, Las Vegas, Nevada. HSBC
25 Bank USA, as Trustee for MANA 2007-AFI ("Movant"), will move this Court, pursuant to 11 U.S.C.
26 §362(d), for an order terminating the automatic stay, to allow Movant to proceed with its

1 non-bankruptcy remedies, including, upon obtaining possession of and selling the subject real property
2 located at 3513 Misty Evening Street, Las Vegas, NV 89129 (the "subject real property").
3

4 PLEASE TAKE FURTHER NOTICE that Local Bankruptcy Rule 9014(d)(1) requires that any
5 opposition to the motion must be filed and service completed upon the Movant not more that fifteen
6 (15) days after service of the motion. The opposition must set forth all relevant facts and must contain a
7 legal memorandum. An opposition may be supported by affidavits or declarations that conform to the
8 provisions of this rule.
9


10
11 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading with the court.
12 You *must* also serve your written response on the person who sent you this notice.

13 If you do not file a written response with the court, or if you do not serve your written response on the
14 person who sent you this notice, then:

- 15 ☐ The court may *refuse to allow you to speak* at the scheduled hearing; and
16 ☐ The court may *rule against you* without formally calling the matter at the hearing

17
18 DATED: 2/2/10

19 WILDE & ASSOCIATES

20 By 
21 GREGORY L. WILDE, ESQ.
22 Attorney for Secured Creditor
23 208 South Jones Boulevard
24 Las Vegas, Nevada 89107
25
26

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18 **CERTIFICATE OF SERVICE OF NOTICE AND**
19 **MOTION FOR RELIEF FROM AUTOMATIC STAY**

20 1. On 2/3/2010 I served the following document(s):
21

22 NOTICE AND MOTION FOR RELIEF FROM AUTOMATIC STAY

23 2. I served the above-named document(s) by the following means to the persons as listed below:

24 X a. ECF System

25 Kathleen Leavitt, at courtsecf3@las13.com, Trustee

26 Barry Levinson, at Michael@lawbybarry.com, Debtors' attorney

X b. United States mail, postage fully prepaid:

Nathaniel Cromwell, Jr. dba Fantasy Scapes
Roshon Cromwell
3513 Misty Evening Street
Las Vegas, NV 89129
Debtors

Barry Levinson, Esq.
2810 S. Rainbow Blvd.
Las Vegas, NV 89146
Debtors' counsel

GE Money Bank
c/o Recovery Management Systems Corp.
Attn: Ramesh Singh
25 SE 2nd Avenue, Suite 1120
Miami, FL 33131-1605

☐ **c. Personal Service** (List persons and addresses. Attach additional paper if necessary)

I personally delivered the document(s) to the persons at these addresses:

☐ 1. For a party represented by an attorney, delivery was made by handing the document(s) to the attorney's office with a clerk or other person in charge, or if no one is charge by leaving the document(s) in a conspicuous place in the office.

N/A

☐ 2. For a party, delivery was made by handing the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there.

N/A

☐ **d. By direct mail (as opposed to through the ECF System)**

(List persons and email addresses. Attach additional paper if necessary)

Based upon the written assignment of the parties to accept service by email or a court order. I caused the document(s) to be sent to the persons at the mail addresses listed below. I did not

1 receive, within a reasonable time after the transmission, any electronic message or other
2 indication that the transmission was unsuccessful.

3 ☐ **e. By fax transmission** *(List persons and fax numbers. Attach additional paper if necessary)*

4 Based upon the written assignment of the parties to accept service by fax transmission or
5 a court order. I faxed the document(s) to the persons at the fax numbers listed below. No error
6 was reported by the fax machine that I used. A copy of the record of the fax transmission is
7 attached.

8
9 ☐ **f. By messenger** *(List persons and addresses. Attach additional paper if necessary)*

10
11 I served the document(s) by placing them in an envelope or package addressed to the
12 persons at the addresses listed below and providing them to a messenger for service.
13 *(A declaration by the messenger must be attached to this Certificate of Service).*

14
15 **I declare under penalty of perjury that the foregoing is true and correct.**

16
17 Signed on : _____

2/3/2010

18 

19 _____
20 Employee of Wilde & Associates
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